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Via ECF and Hand Delivery

February 12, 2020

The Honorable George B. Daniels U.S. District Judge Daniel Patrick Moynihan U.S. Courthouse 500 Pearl Street New York, NY 10007	The Honorable Sarah Netburn U.S. Magistrate Judge Thurgood Marshall United States Courthouse 40 Foley Square, Room 430 New York, NY 10007
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Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN);
Lloyd A. Abel Sr. et al. v. Islamic Republic of Iran, No. 1:18-cv-11837 (GBD) (SN);
Roberta Agyeman et al. v. Islamic Republic of Iran, No. 1:18-cv-05320 (GBD) (SN);
Jessica DeRubbio et al. v. Islamic Republic of Iran, No. 1:18-cv-05306 (GBD) (SN);
Cheryl Rivelli et al. v. Islamic Republic of Iran, No. 1:18-cv-11878 (GBD) (SN);
Matthew Rowenhorst et al. v. Islamic Republic of Iran, No. 1:18-cv-12387 (GBD) (SN)

Dear Judge Daniels and Magistrate Judge Netburn:

In anticipation of the February 19, 2020 deadline for the next round of applications to the United States Victims of State Sponsored Terrorism Fund (USVSST Fund), we write to inquire on the status of the following pending motions for final judgments against Iran, which we believe were all filed by the deadlines the Court set for anticipated decision in time for the upcoming USVSST Fund deadline. The chart below includes the original motion sequence number, the date of filing, the type of damages sought and details regarding the proposed judgment (such as the ECF number):

New York, NY ■ Los Angeles, CA ■ Stamford, CT ■ Washington, DC ■ Newark, NJ ■ Philadelphia, PA

Anderson Kill P.C.

February 12, 2020

Page 2

	Case No.	MDL ECF No. of Motion	Date Motion Filed	Damages Motion Sought	Proposed Judgment Information
1.	No. 1:18-cv-11837	5584 et seq.	1/15/2020	Solatium Damages for Immediate Family Members and Estate Economic Loss	Proposed Judgment filed 01/15/2020 (ECF No. 5588)
2.	No. 1:18-cv-11837	4910 et seq.	08/20/2019	Solatium Damages for Non-Immediate Family Members ¹	Report and Recommendation (ECF No. 5735)
3.	No. 1:18-cv-05320	4914 et seq.	08/20/2019	Solatium Damages for Non-Immediate Family Members	Report and Recommendation (ECF No. 5735)
4.	No. 1:18-cv-05306	4918 et seq.	08/20/2019	Solatium Damages for Non-Immediate Family Members	Report and Recommendation (ECF No. 5735)
5.	No. 1:18-cv-11878	5420 et seq.	08/21/2019	Solatium Damages for Non-Immediate Family Members	Proposed Judgment Adopting in Part Report & Recommendation Filed 2020-02-10 (ECF No. 5891)
6.	No. 1:18-cv-12387	4930 et seq.	08/21/2019	Solatium Damages for Non-Immediate Family Members	Report and Recommendation (ECF No. 5735)

For the convenience of the Court with regards to items two, three, four, and six above, we have attached a Proposed Order in line with the one filed by the *Ashton, Bauer, Burlingame* and *Rivelli* Plaintiffs on February 10, 2020, which relates to item five above. ECF No. 5891.

We are mindful of the tremendous demand that the upcoming USVSST Fund has undoubtedly placed on the Court and submit this letter only because we must proceed with obtaining Farsi translations of any final judgments and commence service prior to February 19, 2020 for our clients to be eligible to participate in the next USVSST Fund

¹ Motions dealing with “Solatium Damages for Non-Immediate Family Members” are functional equivalent motions.

Anderson Kill P.C.

February 12, 2020
Page 3

round.

If the Court has any questions regarding the motions identified above, I am available directly at (212) 278-1569 and will aim to provide a response immediately upon request.

We thank the Court for its attention to this matter.

Respectfully submitted,



Jerry S. Goldman, Esq.

Enclosures

cc: All counsel via ECF